

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 23-cv-21495-DSL/Torres

RINALDI ENTERPRISES OF FLORIDA,
LLC, a Florida limited liability company,

Plaintiff,

v.

UNITED STATES FIRE INSURANCE
COMPANY, a foreign corporation,

Defendant.

JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE

Plaintiff/Counter-Defendant, RINALDI ENTERPRISES OF FLORIDA, LLC, Defendant/Counter-Plaintiff, UNITED STATES FIRE INSURANCE COMPANY, Intervenor-Defendant/Counter-Plaintiff, PEREZ STRUCTURAL, INC., and Counter-Defendant, LIBERTY MUTUAL INSURANCE COMPANY (collectively the “Parties”), pursuant to Rule 41(a)(1)(A)(ii), *Fed.R.Civ.P.*, hereby stipulate to this Joint Stipulation of Dismissal without Prejudice on the following grounds:

1. All claims and causes of action in this lawsuit asserted by and between the Parties in this lawsuit are to be dismissed without prejudice. The Parties reserve all rights, claims, and defenses among them, including, but not limited to, the right to recover prevailing party attorneys’ fees, costs and interest in any subsequently filed litigation.
2. No party admits liability and this stipulation shall not be construed as an admission of liability.

3. The Parties request the Court issue an Order of Dismissal without Prejudice adopting the terms of this Joint Stipulation of Dismissal without Prejudice.

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CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that on this 23rd day of October 2024, we electronically filed the foregoing document with the Clerk of the Court using CM/ECF. We also certify that the foregoing document is being served this day on all parties of record, via transmission of Notice of Electronic Filing generated by CM/ECF or in some other authorized manner for those parties who are not authorized to receive electronically Notices of Electronic Filing.

By: /s/ Marshall Adams
Marshall A. Adams, Esq.